

discovery, pursuant to FED. R. CIV. P. 26(b)(1) with respect to the request for knowledge, notice or information related to any violent crimes between March 1, 2008 to March 13, 2013. Subject to and without waiving the foregoing objections, Defendant MASP responds that it called the local police department for various criminal activities since owning and operating the hotel. Defendant MASP cannot recall each and every violent crime that it was aware of that occurred on the premises during this subject time period, which is over ten years ago.

5.

Please identify all actions taken, documents created, and communications made by you in response to the incident forming the basis of Plaintiffs' Complaint and identify the person(s) who took such action or had knowledge thereof.

**RESPONSE:** Defendant MASP objects to this Interrogatory to the extent it seeks information and documentation protected from disclosure under the attorney-client privilege, work product doctrine, and/or was created in anticipation of litigation. Subject to and without waiving the foregoing objections, Defendant MASP did not become aware of the subject incident until it received notice of Plaintiffs' claims and Plaintiffs' Complaint. After receiving notice of Plaintiffs' claims, defense counsel became involved to

**investigate and defend Defendant MASP against Plaintiffs' claims. Defendant MASP is not in possession, custody or control of any documents responsive to this Interrogatory.**

6.

Identify by name, address, and phone number all persons who you believe may have knowledge of any of the events described in Plaintiffs' Complaint, and for each such person, state what you believe to be the substance of that person's knowledge.

**RESPONSE: Defendant MASP responds that Plaintiffs, their friends, family, traffickers Craig Alexander Hill and T'Keyah Adams, and any of Plaintiffs' buyers (or "Johns") may have knowledge of any of the events described in their Complaint.**

7.

Identify all expert witnesses you intend to call or may call at trial, and, for each expert:

- i. State the subject matter on which the expert is expected to testify;
- ii. State the substance of the facts and the opinion to which the expert is expected to testify; and
- iii. Provide a summary of the grounds of each opinion.